

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BROOKE RYAN, *on behalf of herself and
all others similarly situated,*

Plaintiff,

v.

TEMPLE UNIVERSITY,

Defendant.

Case No. 2:20-cv-02164-JMG

CHRISTINA FUSCA, *on behalf of herself and
all others similarly situated,*

Plaintiff,

v.

TEMPLE UNIVERSITY,

Defendant.

Case No. 2:20-cv-03434-JMG

**DECLARATION OF MARK COWEN REGARDING
CONFIRMATION OF NOTICE TO THE CLASS**

I, Mark Cowen, hereby declare as follows:

1. I am a Project Manager at A.B. Data, Ltd.’s Class Action Administration Division (“A.B. Data”), whose Corporate Office is located in Milwaukee, Wisconsin. This declaration (“Declaration”) is based upon my personal knowledge, and that of A.B. Data staff members, and if called as a witness, I could and would testify competently thereto.

2. I submit this Declaration in connection with the class action notice administration proceedings related to the above-captioned Action (the “Action”).

3. This Declaration details the steps that were taken to implement notice of the settlement as required by the Court’s “Preliminary Approval Order” filed on October 15, 2024. Those steps included: i) emailing the Email Notice of Class Action Settlement to Class Members where an email address was available; ii) mailing the Court-approved Short-Form Notice to Class Members; iii) establishing a toll-free telephone number and case-specific website to address potential Class Member inquiries and posting the Long-Form Notice to the website, along with other materials; and iv) responding to telephone calls and emails from Class Members.

CAFA NOTICE

4. Pursuant to the Settlement Agreement between the Named Plaintiff and on behalf of the Defendant, notice was required to be served on certain government officials pursuant to the Class Action Fairness Act, 28 U.S.C. § 1715 *et seq.* (“CAFA”) within ten (10) calendar days from the filing of the Motion for Preliminary Approval.

5. On October 11, 2024, A.B. Data caused CAFA Notice to be sent via United States Postal Service (“USPS”) Priority Mail or Certified Mail (where Priority Mail was not available) to the United States Attorney General and the Attorneys General of each of the fifty States and the District of Columbia. The CAFA Notices included portable media that included all documents and information as required by CAFA. A copy of the CAFA Notice is attached as Exhibit A.

DISSEMINATION OF NOTICE

6. On October 28, 2024, A.B. Data received electronic data files containing information for 32,101 Class Members from Defense Counsel. All Class

Member information that was provided to A.B. Data has been stored in a secure environment with controlled access.

ELECTRONIC MAILING OF THE NOTICE

7. A.B. Data prepared to send an electronic mailing of the Email Notice to Class Members who had an email address on file. To best provide Notice to the Class, Email Notice was sent to all unique email addresses on a Class Member record. Prior to sending the Email Notice, A.B. Data conducted an email validation exercise to remove invalid and duplicate email addresses. This helps ensure the overall deliverability of the valid email addresses. A.B. Data initially determined there were 38,314 distinct and valid email addresses.

8. A.B. Data commenced sending the Email Notice on November 12, 2024, with 35,171 out of 38,314 Class Member records confirmed as delivered, which is a 91.8% delivery rate. A true and correct copy of the Email Notice is attached as Exhibit B.

SUPPLEMENTAL ELECTRONIC MAILING OF THE NOTICE

9. A supplemental data file was received on November 21, 2024, containing additional Class Members that were inadvertently not in the initial Class List. In total, there were an additional 46 Class Members that were received, with 56 unique email addresses.

10. A supplemental Email Notice was sent on December 6, 2024, to the additional email addresses noted above. A total of 56 emails were sent, of which 55 were confirmed as delivered.

11. On November 20, 2024, A.B. Data was contacted by an individual who believed she was an eligible Class Member based on the class definition as defined in the Settlement, but who did not receive Email Notice. After confirmation by

Temple University, this individual was verified as an eligible Class Member, and was sent an Email Notice on December 20, 2024.

MAILING OF SHORT-FORM NOTICE

12. For those Class Member records where there was not an email address available, or the email address(es) was/were invalid, they were then sent a Short-Form Notice via First-Class Mail. In total, there were 2,752 Short-Form Notices mailed via First-Class Mail on November 12, 2024. A true and correct copy of the Short-Form Notice is attached as Exhibit C.

13. For those Class Member records where the Email Notice sent was not delivered, then a Short-Form Notice was sent via First-Class Mail. In total, there were 3,080 Short-Form Notices mailed via First-Class Mail on November 27, 2024.

14. Of the Notices that were mailed, 130 were returned as undeliverable by the USPS.

WEBSITE AND TELEPHONE

15. On November 12, 2024, A.B. Data established a case-specific toll-free telephone number (1-877-252-4685) with an interactive voice response (“IVR”) system which provided summary information to frequently asked questions. This also provided callers with the opportunity to speak with a live Service Representative.

16. On November 12, 2024, A.B. Data established a case-specific website, www.templecovidsettlement.com. The website includes case-specific information, including relevant deadlines and downloadable versions of the Settlement Agreement, Long-Form Notice, and other relevant documents. The website also provided Class Members the opportunity to submit an Election Form to update their contact information, make a Settlement Benefit payment selection, and/or request a Non-Cash Benefit.

OBJECTIONS

17. As of the date of this Declaration, A.B. Data has not received any written objections or comments related to the Settlement.

OPT OUTS

18. As of the date of this Declaration, A.B. Data has not received any requests to opt out of the Settlement.

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 12th day of February 2025 in Apple Valley, MN.

A handwritten signature in dark ink, appearing to read 'Mark Cowen', is written over a light blue rectangular background.

Mark Cowen

EXHIBIT A

A.B. DATA, LTD.

Class Action Administration



October 11, 2024

Attorney General of the United States
Attorneys General of the States

Re: Notice of Proposed Class Action Settlement in *Brooke Ryan, individually and on behalf of all others similarly situated v. Temple University*, United States District Court for the Eastern District of Pennsylvania, No. 20-cv-02164-JMG (including *Fusca v. Temple University*, No. 20-cv-03434-JMG, consolidated therein)

Dear Attorneys General:

A.B. Data, Ltd., class action Settlement Administrator, on behalf of Temple University—Of The Commonwealth System of Higher Education (“Temple”, the “University” or “Defendant”), the defendant in the above-referenced action, hereby provides the following notice pursuant to Section 1715 of the Class Action Fairness Act (28 U.S.C. § 1715).

On September 4, 2020, plaintiffs Brooke Ryan and Christina Fusca (“Plaintiffs”) filed a Consolidated Second Amended Class Action Complaint as a putative Rule 23 class action, alleging that Temple contracted with, charged, and collected from its students funds for in-person education and on-campus access and services for the Spring 2020 semester, but that Temple failed to deliver an in-person education and on-campus access and services when, in response to the Covid-19 pandemic, Temple transitioned to an online environment.

On April 26, 2023, the Parties held a mediation with the Hon. Diane M. Welsh (Ret.), which was unsuccessful. While no agreement was reached that day, the Parties remained in contact with one another and continued to engage in settlement discussions.

On February 23, 2024, the Parties held a second mediation session and reached an agreement in principle on a class action settlement. The settlement negotiations were hard-fought and at arm’s length under the supervision and oversight of Judge Welsh.

At all times, Defendant has denied and continues to deny any wrongdoing whatsoever and has denied and continues to deny that it committed, or threatened or attempted to commit, any wrongful act, breach of contract, or violation of law or duty alleged in the Actions. Nonetheless, taking into account the expense, uncertainty, burden, and risks inherent in any litigation, and the desire to avoid the expenditure of further legal fees and costs, Defendant

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has concluded it is desirable and beneficial that the Actions be fully and finally settled and terminated in the manner and upon the terms and conditions set forth in this Agreement. This Agreement is a compromise, and the Agreement, any related documents, and any negotiations resulting in it shall not be construed as or deemed to be evidence of or an admission or concession of liability or wrongdoing on the part of Defendant, or any of the Released Parties, with respect to any claim of any fault or liability or wrongdoing or damage whatsoever or with respect to the certifiability of a litigation class.

On October 2, 2024, the Proposed Settlement was filed with the Court, along with a motion for preliminary approval, and proposed related notices, forms and orders.

COMPLIANCE WITH 28 U.S.C. § 1715

Each of the requirements of notice pursuant to 28 U.S.C. § 1715(b)(1) – (8) is addressed below. All referenced exhibits are provided electronically at <https://bit.ly/Temple-University-CAFA> or by scanning this QR code:



To be added to our email list to receive CAFA correspondence digitally, please email help@abdataclassaction.com and we will add you to our email list.

1. Plaintiff's September 4, 2020, Complaint, all materials filed therewith, is available as Exhibit A at the link above.
2. The Court has not yet scheduled, but is anticipated to schedule, a Final Approval Hearing to consider the parties' Proposed Settlement before the Honorable John M. Gallagher of the United States District Court for the Eastern District of Pennsylvania. The date and time of the final hearing will be a matter of public record, will be provided in the Short Form Notice sent to Settlement Class Members, and will be available on A.B. Data's settlement website for this matter.
3. Plaintiff's Unopposed Motion for Preliminary Approval is available as Exhibit B at the link above.
4. Memorandum of Law in Support of Plaintiff's Unopposed Motion for Preliminary Approval is available as Exhibit C at the link above.



A.B. DATA, LTD.

abdataclassaction.com

New York | Washington, D.C. | Chicago | West Palm Beach | Milwaukee

US Attorney General
Attorneys General of the States
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5. The parties' Settlement Agreement, which includes as exhibits the Proposed Short Form Notice and Long Form Notice, is available as Exhibit D at the link above.
6. Other than the Settlement Agreement referenced above, there are no contemporaneous agreements between counsel for Plaintiff and counsel for Defendant.
7. No final judgment or notice of dismissal have yet been entered in this case.
8. There are approximately 33,000 Settlement Class Members. Pursuant to 28 U.S.C. § 1715(b)(7)(B), Temple has provided a reasonable estimate of the percentage of total Settlement Class Members for each state, which is available as Exhibit E at the link above.
9. Subject to Court approval, the total Settlement Fund will be allocated amongst the Settlement Class Members as described in Paragraph 2.2 (c) of the parties' Settlement Agreement, after any deductions are made for incentive awards to the Settlement Class Representatives, Class Counsel's fees and costs, and the Settlement Administrator's fees and costs.
10. There have not yet been any written judicial opinions in this case.

Sincerely,

A.B. Data, Ltd.
Class action Settlement Administrator on behalf of Defendant



A.B. DATA, LTD.

abdataclassaction.com

New York | Washington, D.C. | Chicago | West Palm Beach | Milwaukee

EXHIBIT B

From: help@mq.abdataclassactionmail.com on behalf of [Temple Covid Settlement](#)
To:
Subject: Notice Of Proposed Class Action Settlement
Date: Tuesday, November 12, 2024 1:26:35 PM

EXTERNAL SENDER

Notice ID: **00145**

PLEASE READ THIS NOTICE CAREFULLY. If you were enrolled at Temple University Of The Commonwealth System of Higher Education ("Temple") as an undergraduate, graduate, or professional student, in at least one in-person, on-campus class during the Spring 2020 Semester, remained enrolled after March 16, 2020, and paid your tuition and/or University Services Fee obligations from any source for that semester, you may be eligible to receive a payment as part of a proposed settlement of *Ryan v. Temple University*, Civil Action No. 20-cv-2164 (E.D. Pa.) (the "Action").

In this Action, Plaintiffs alleged Temple breached a contract when it transitioned to remote learning in the Spring 2020 Semester in response to Governmental shutdown orders issued because of the COVID-19 pandemic. Plaintiffs also alleged that Temple's transition to remote learning gave rise to a claim for unjust enrichment. Plaintiffs sought a refund of a portion of their tuition and University Services Fee for the Spring 2020 Semester. Temple has agreed to pay \$6,900,000 into a Settlement Fund to resolve the Action. Temple denies all allegations of wrongdoing in the Action and has agreed to a settlement to avoid the expense, uncertainty, and burden of continued litigation.

Am I a Class Member? If you were enrolled as a Temple undergraduate, graduate, or professional student during the Spring 2020 Semester, paid your tuition and/or University Services Fee obligations from any source for the Spring 2020 Semester, and remained enrolled after March 16, 2020, then you may be part of the proposed settlement class (a "Settlement Class Member"). **If you are a Settlement Class Member, you do not have to do anything to participate in and receive the Cash Award portion of the proposed Settlement.**

How Do I Get a Payment? Your Cash Award will be sent automatically by First-Class U.S. Mail to your last known mailing address on file with the Temple Registrar. You will also have the option to visit the Settlement website at www.TempleCovidSettlement.com to choose one or more of the following selections: (a) provide an updated address for sending a check; (b) elect to receive the Cash Award by Venmo or PayPal instead of a paper check; (c) elect to apply the Cash Award to your Temple account; or (d) elect to donate the Cash Award to Temple's General Scholarship Fund. These actions must be taken no later than forty-five (45) days after the Notice Date, or **December 27, 2024**.

Additionally, Settlement Class Members will have forty-five (45) days after the Notice Date, or **December 27, 2024**, to select one of the Non-Cash Benefits: (i) one non-transferable Temple University home football season ticket (seat location to be determined at Temple's discretion) for the two consecutive seasons after the Settlement is finally approved by the Court and is no longer subject to appeal (the "Effective Date"); (ii) one non-transferable Alumni Recreation Access pass, which will be issued to Settlement Class Members who elect

this option in a reasonable amount of time after the Effective Date, and which will last for approximately two consecutive years; or (iii) one non-transferable course offered through Temple's Office of Non-Credit and Continuing Education, which must be redeemed within one year of the Effective Date. The course number must start with ONCE. Online, self-paced courses offered in partnership with LERN/UGotClass, ed2go, and ETC are excluded from this Non-Cash Benefit. Your selection must be made no later than **December 27, 2024**.

If you remain in the Settlement Class, you release your right to bring any claim covered by the proposed Settlement, including bringing any claim related to Temple's transition to remote learning during the Spring 2020 Semester.

What Are My Other Options? If you do not want to participate in this proposed Settlement—meaning you do not want to receive the Settlement benefits, and you do not want to be bound by any judgment entered in this case—you may exclude yourself by mailing a signed opt-out request to the Settlement Administrator, which must be postmarked no later than **January 13, 2025**. If you want to object to this proposed Settlement or the request for attorneys' fees by Class Counsel, you may file an objection by **January 13, 2025**. Please follow the detailed instructions outlined in the Long-Form Notice and the Settlement Agreement, which can both be found at www.TempleCovidSettlement.com, to properly opt out from, or object to, the proposed Settlement.

What Happens Next? The Court has preliminarily approved the proposed Settlement, but the distribution of Cash Awards and Non-Cash Benefits will occur only if the Court grants final approval of the proposed Settlement. The Final Approval Hearing in this case is scheduled for **February 26, 2025**. At that hearing, the Court will consider whether to grant final approval of the proposed Settlement, and whether to approve payment from the Settlement Fund of: (1) awards to the Settlement Class Representatives of \$5,000 apiece for their service in this litigation; and (2) Class Counsel's request for attorneys' fees, which will not exceed \$2,300,000 (equaling thirty-three and one-third percent of the Settlement Fund), and litigation expenses, which will not exceed \$250,000. The fee petition will be posted on the Settlement website after **December 30, 2024**.

You are encouraged to review the Long-Form Notice. To review the Long-Form Notice, review other important court documents, including the Settlement Agreement, and obtain more information about the proposed Settlement, please visit www.TempleCovidSettlement.com.

If you have any questions, you can contact Class Counsel: Nicholas A. Colella at Lynch Carpenter, LLP, (412) 322-9243; or Paul J. Doolittle at Poulin | Willey | Anastopoulos, LLC, (843) 614-8888.

You can also contact the Settlement Administrator by calling toll-free 1-877-252-4685, or by emailing info@TempleCovidSettlement.com.

Temple University Covid Settlement
C/O A.B. Data, Ltd.
P.O. Box 173000
Milwaukee, WI 53217

SETTLEMENT CLASS MEMBER ELECTION FORM

The Cash Award will be sent automatically by First-Class U.S. Mail to Settlement Class Members' last known mailing address on file with the Temple University Registrar. You can complete this Election Form to provide an updated mailing address for sending a check.

Settlement Class Members also have the option, but are not required, to complete this Election Form to choose one of the following options: (a) elect to receive the Cash Award by Venmo or PayPal instead of a paper check; (b) elect to have the Cash Award applied to your Temple account; or (c) elect to donate the Cash Award into Temple's General Scholarship Fund.

In addition to the Cash Award, Settlement Class Members may, but are not required to, complete this Election Form to choose one of the following Non-Cash Benefits: (i) one non-transferable Temple University home football season ticket (seat location to be determined at Temple's discretion) for the two consecutive seasons after the Settlement is finally approved by the Court and is no longer subject to appeal (the "Effective Date"); (ii) one non-transferable Alumni Recreation Access pass, which will be issued to Settlement Class Members who elect this option in a reasonable amount of time after the Effective Date, and which will last for approximately two consecutive years; or (iii) one non-transferable course offered through Temple's Office of Non-Credit and Continuing Education, which must be redeemed within one year of the Effective Date. The course number must start with ONCE. Online, self-paced courses offered in partnership with LERN/UGotClass, ed2go, and ETC are excluded from this Non-Cash Benefit.

You may also notify the Settlement Administrator by emailing to info@TempleCovidSettlement.com or by writing to the Settlement Administrator at Temple Covid Settlement, c/o A.B. Data, Ltd., P.O. Box 173000, Milwaukee, WI 53217.

These actions must be taken no later than forty-five (45) days after the Notice Date, or December 27, 2024.

SETTLEMENT CLASS MEMBER INFORMATION

If you wish to update your mailing address, please complete the Information Form below:

Full Name (required)

Mailing Address (Street, P.O. Box, Suite, or Office Number) (required)

City (required)

State/Territory (required)

Zip Code (required)

Country (required)

* A valid mailing address must be provided to receive a check. If the address you have on file changes, it is your responsibility to provide accurate contact information to the Settlement Administrator to receive a payment.

Additional Information

Notice ID (required):

735400145

* Your Notice ID is located on the upper right-hand corner on the Settlement Notice that was emailed or mailed to you. If you do not know your Notice ID, please contact the Settlement Administrator by emailing to info@TempleCovidSettlement.com or calling toll-free 1-877-252-4685.

Email Address (not required)

* A valid email address must be provided to receive digital payment. If the email address you have on file changes or becomes invalid for any reason, it is your responsibility to provide accurate contact information to the Settlement Administrator to receive a digital payment.

Telephone Number (not required)

Cash Award Payment Options

If you would like to request a digital payment (Venmo or PayPal), instead of a paper check, please check the box below.

☐ I request to have my Cash Award be in the form of a digital payment via Venmo or PayPal. (not required)

If you would like to request a credit to your Temple account instead of a paper check, please check the box below.

☐ I request to have my Cash Award credited to my Temple account. (not required)

If you would like to donate your Cash Award, please check the box below.

☐ I request to donate my Cash Award into Temple's General Scholarship Fund. (not required)

Non-Cash Benefits

If you would like to request a Non-Cash Benefit in addition to the Cash Award, please check **just one** of the boxes below. Please note that the Non-Cash Benefit will only be available to those Settlement Class Members who select one of the options below, and timely submit the Election Form no later than December 27, 2024.

☐ One non-transferable Temple University home football season ticket (seat location to be determined at Temple's discretion) for the two consecutive seasons following the Effective Date. (not required)

☐ One non-transferable Alumni Recreation Access pass, which will be issued to Settlement Class Members who elect this option in a reasonable amount of time after the Effective Date, and which will last for approximately two consecutive years. (not required)

☐ One non-transferable course offered through Temple's Office of Non-Credit and Continuing Education, which must be redeemed within one year of the Effective Date. The course number must start with ONCE. Online, self-paced courses offered in partnership with LERN/UGotClass, ed2go, and ETC are excluded from this Non-Cash Benefit. (not required)

If you'd like to unsubscribe [click here](#).

EXHIBIT C

TEMPLE UNIVERSITY COVID SETTLEMENT
C/O A.B. DATA, LTD.
P.O. BOX 173000
MILWAUKEE, WI 53217

FIRST CLASS MAIL
U.S. POSTAGE
PAID
MILWAUKEE, WI
PERMIT NO 3780



Name
Street
City State Zip

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Notice ID: [REDACTED] 1269

PLEASE READ THIS NOTICE CAREFULLY. If you were enrolled at Temple University Of The Commonwealth System of Higher Education (“Temple”) as an undergraduate, graduate, or professional student, in at least one in-person, on-campus class during the Spring 2020 Semester, remained enrolled after March 16, 2020, and paid your tuition and/or University Services Fee obligations from any source for that semester, you may be eligible to receive a payment as part of a proposed settlement of *Ryan v. Temple University*, Civil Action No. 20-cv-2164 (E.D. Pa.) (the “Action”).

In this Action, Plaintiffs alleged Temple breached a contract when it transitioned to remote learning in the Spring 2020 Semester in response to Governmental shutdown orders issued because of the COVID-19 pandemic. Plaintiffs also alleged that Temple’s transition to remote learning gave rise to a claim for unjust enrichment. Plaintiffs sought a refund of a portion of their tuition and University Services Fee for the Spring 2020 Semester. Temple has agreed to pay \$6,900,000 into a Settlement Fund to resolve the Action. Temple denies all allegations of wrongdoing in the Action and has agreed to a settlement to avoid the expense, uncertainty, and burden of continued litigation.

Am I a Class Member? If you were enrolled as a Temple undergraduate, graduate, or professional student during the Spring 2020 Semester, paid your tuition and/or University Services Fee obligations from any source for the Spring 2020 Semester, and remained enrolled after March 16, 2020, then you may be part of the proposed settlement class (a “Settlement Class Member”). **If you are a Settlement Class Member, you do not have to do anything to participate in and receive the Cash Award portion of the proposed Settlement.**

How Do I Get a Payment? Your Cash Award will be sent automatically by First-Class U.S. Mail to your last known mailing address on file with the Temple Registrar. You will also have the option to visit the Settlement website at www.TempleCovidSettlement.com to choose one or more of the following selections: (a) provide an updated address for sending a check; (b) elect to receive the Cash Award by Venmo or PayPal instead of a paper check;

(c) elect to apply the Cash Award to your Temple account; or (d) elect to donate the Cash Award to Temple's General Scholarship Fund. These actions must be taken no later than forty-five (45) days after the Notice Date, or **December 27, 2024**.

Additionally, Settlement Class Members will have forty-five (45) days after the Notice Date, or **December 27, 2024**, to select one of the Non-Cash Benefits: (i) one non-transferable Temple University home football season ticket (seat location to be determined at Temple's discretion) for the two consecutive seasons after the Settlement is finally approved by the Court and is no longer subject to appeal (the "Effective Date"); (ii) one non-transferable Alumni Recreation Access pass, which will be issued to Settlement Class Members who elect this option in a reasonable amount of time after the Effective Date, and which will last for approximately two consecutive years; or (iii) one non-transferable course offered through Temple's Office of Non-Credit and Continuing Education, which must be redeemed within one year of the Effective Date. The course number must start with ONCE. Online, self-paced courses offered in partnership with LERN/UGotClass, ed2go, and ETC are excluded from this Non-Cash Benefit. Your selection must be made no later than **December 27, 2024**.

If you remain in the Settlement Class, you release your right to bring any claim covered by the proposed Settlement, including bringing any claim related to Temple's transition to remote learning during the Spring 2020 Semester.

What Are My Other Options? If you do not want to participate in this proposed Settlement—meaning you do not want to receive the Settlement benefits, and you do not want to be bound by any judgment entered in this case—you may exclude yourself by mailing a signed opt-out request to the Settlement Administrator, which must be postmarked no later than **January 13, 2025**. If you want to object to this proposed Settlement or the request for attorneys' fees by Class Counsel, you may file an objection by **January 13, 2025**. Please follow the detailed instructions outlined in the Long-Form Notice and the Settlement Agreement, which can both be found at www.TempleCovidSettlement.com, to properly opt out from, or object to, the proposed Settlement.

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You are encouraged to review the Long-Form Notice. To review the Long-Form Notice, review other important court documents, including the Settlement Agreement, and obtain more information about the proposed Settlement, please visit **www.TempleCovidSettlement.com**.

If you have any questions, you can contact Class Counsel: Nicholas A. Colella at Lynch Carpenter, LLP, (412) 322-9243; or Paul J. Doolittle at Poulin | Willey | Anastopoulos, LLC, (843) 614-8888.

You can also contact the Settlement Administrator by calling toll-free 1-877-252-4685, or by emailing **info@TempleCovidSettlement.com**.

SETTLEMENT CLASS MEMBER ELECTION FORM

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Settlement Class Members also have the option, but are not required, to complete this Election Form to choose one of the following options: (a) elect to receive the Cash Award by Venmo or PayPal instead of a paper check; (b) elect to have the Cash Award applied to your Temple account; or (c) elect to donate the Cash Award into Temple's General Scholarship Fund.

In addition to the Cash Award, Settlement Class Members may, but are not required to, complete this Election Form to choose one of the following Non-Cash Benefits: (i) one non-transferable Temple University home football season ticket (seat location to be determined at Temple's discretion) for the two consecutive seasons after the Settlement is finally approved by the Court and is no longer subject to appeal (the "Effective Date"); (ii) one non-transferable Alumni Recreation Access pass, which will be issued to Settlement Class Members who elect this option in a reasonable amount of time after the Effective Date, and which will last for approximately two consecutive years; or (iii) one non-transferable course offered through Temple's Office of Non-Credit and Continuing Education, which must be redeemed within one year of the Effective Date. The course number must start with ONCE. Online, self-paced courses offered in partnership with LERN/UGotClass, ed2go, and ETC are excluded from this Non-Cash Benefit.

You may also notify the Settlement Administrator by emailing to info@TempleCovidSettlement.com or by writing to the Settlement Administrator at Temple Covid Settlement, c/o A.B. Data, Ltd., P.O. Box 173000, Milwaukee, WI 53217.

These actions must be taken no later than forty-five (45) days after the Notice Date, or December 27, 2024.

SETTLEMENT CLASS MEMBER INFORMATION

If you wish to update your mailing address, please complete the Information Form below:

Full Name (required):

Mailing Address (Street, P.O. Box, Suite, or Office Number) (required):

City (required):

State/Territory (required):

Zip Code (required):

Country (required):

- * A valid mailing address must be provided to receive a check. If the address you have on file changes, it is your responsibility to provide accurate contact information to the Settlement Administrator to receive a payment.

Additional Information

Notice ID (required):

- * Your Notice ID is located on the upper right-hand corner on the Settlement Notice that was emailed or mailed to you. If you do not know your Notice ID, please contact the Settlement Administrator by emailing to info@TempleCovidSettlement.com or calling toll-free 1-877-252-4685.

Email Address (not required):

- * A valid email address must be provided to receive digital payment. If the email address you have on file changes or becomes invalid for any reason, it is your responsibility to provide accurate contact information to the Settlement Administrator to receive a digital payment.

Telephone Number (not required):

Cash Award Payment Options

If you would like to request a digital payment (Venmo or PayPal), instead of a paper check, please check the box below.

- ☐ I request to have my Cash Award be in the form of a digital payment via Venmo or PayPal.
(not required)

If you would like to request a credit to your Temple account instead of a paper check, please check the box below.

- ☐ I request to have my Cash Award credited to my Temple account. (not required)

If you would like to donate your Cash Award, please check the box below.

- ☐ I request to donate my Cash Award into Temple's General Scholarship Fund.
(not required)

Non-Cash Benefits

If you would like to request a Non-Cash Benefit in addition to the Cash Award, please check **just one** of the boxes below. Please note that the Non-Cash Benefit will only be available to those Settlement Class Members who select one of the options below, and timely submit the Election Form no later than **December 27, 2024**.

- ☐ One non-transferable Temple University home football season ticket (seat location to be determined at Temple's discretion) for the two consecutive seasons following the Effective Date. (not required)
- ☐ One non-transferable Alumni Recreation Access pass, which will be issued to Settlement Class Members who elect this option in a reasonable amount of time after the Effective Date, and which will last for approximately two consecutive years. (not required)
- ☐ One non-transferable course offered through Temple's Office of Non-Credit and Continuing Education, which must be redeemed within one year of the Effective Date. The course number must start with ONCE. Online, self-paced courses offered in partnership with LERN/UGotClass, ed2go, and ETC are excluded from this Non-Cash Benefit. (not required)